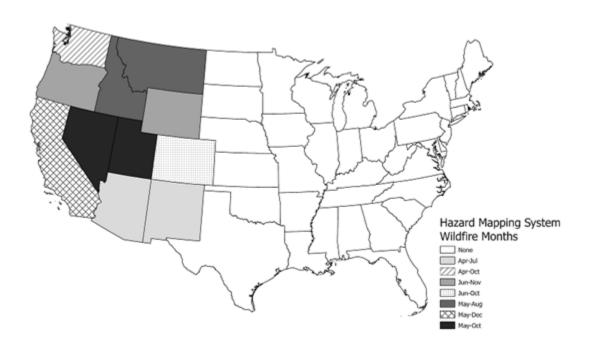
2020 NFI Frrata

The following errors were discovered after the release of the 2020 NEI on March 31, 2023. This is living document, meaning that as we receive notification of issues with the NEI, we will update this document with the most-recently identified issues appearing at the top.

Update July 18, 2023

Wild and Prescribed Fires and Field Burning

Figure 7.3 in the <u>2020 NEI TSD</u> needed to be corrected to accurately depict the months for Idaho and Montana where the default is to identify satellite detects as wildfires. The color depicted figure has been updated with a grayscale friendly figure as well. Here is the corrected Figure 7.3:



June 16, 2023 update

Point Inventory, Atlanta Hartsfield

We discovered in June 2023 that EPA estimates for an auxiliary power unit at Atlanta Hartsfield-Jackson Atlanta International Airport (EIS facility ID = 9748811, EIS process ID = 173816514) was included in the 2020 NEI despite GA DNR having submitted an APU at that airport (EIS process ID = 99985914). The EPA estimate of 93.43141 tons of NOX is therefore an overestimate in the 2020 NEI; GA DNR submitted a value of 98.37931 tons of NOX.

Nonpoint Inventory, Paved and Unpaved Road Dust, PM, National

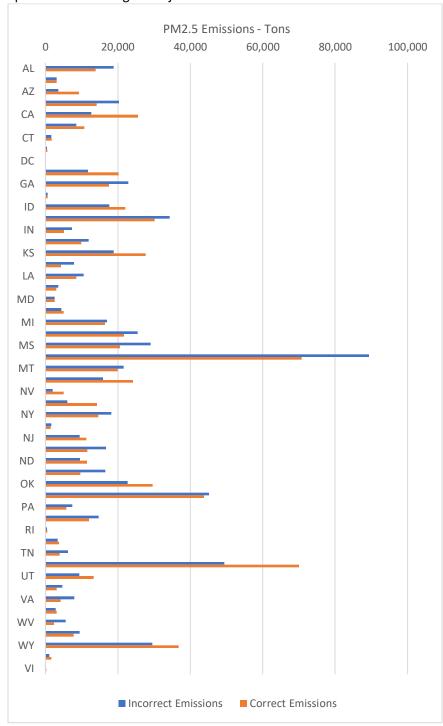
The calculations for emissions of particulate matter from dust from paved and unpaved roads include an adjustment to account for the impact of precipitation on the emission rates. This meteorological adjustment is based on modeling conducted by EPA to generate the SMOKE flat files. The adjustment factor is a number

between 0 and 1 that is multiplied by the emissions estimates to account for the factor that areas with higher precipitation will have lower dust emissions from roads.

For the 2020 NEI, there were two errors with how the meteorological adjustment factors were applied to the calculations for emissions from paved and unpaved roads. First, instead of applying the meteorological adjustment factors, the calculations incorrectly used a total reduction factor that was also generated for the SMOKE flat files. Second, the total reduction was applied before being converted from a percent reduction to an adjustment factor (i.e., the percent reduction should have been subtracted from 1).

This error resulted in PM25-PRI emissions from this sector being about 1.22% lower nationally than if the meteorological adjustment had been applied correctly. The impact at the state- and county-levels varies (Figures 1 and 2). The largest impacts occur in areas where the transport reduction and meteorological reductions differ the most, which is areas with lower precipitation.

Figure 1: Impact of Meteorological Adjustment Factor Error on State Total Road Dust Emissions



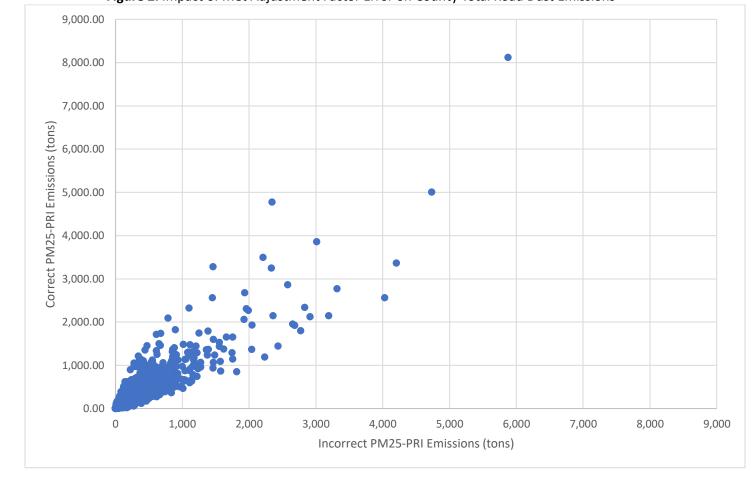


Figure 2: Impact of Met Adjustment Factor Error on County Total Road Dust Emissions

Initial set of issues: May 22, 2023

Point Inventory, VOC, Oregon:

On May 3, 2023, David Broderick of ORDEQ edited VOC at EIS Facility 19085411 SunPower Manufacturing Oregon, LLC Emission Unit = "MB" from 2489 Tons to 2489 Lbs in the State dataset only. The value in the "2020 NEI" selection was tagged, such that when 2021 NEI selection is re-run next that value will not be used as a gap fill. The 2021 NEI draft run April 30, 2023, contains the 2489 Tons value.

Point Inventory, Mercury (Hg), New York:

The following Hg emissions in the 2020NEI are outlier values, are likely overestimated, and were removed from the mercury summary information provided in section 2.7 the 2020NEI TSD.

FIPS	EIS Facility		EIS Unit	EIS Process	Hg emissions
code	ID	Facility Name	ID	ID	(lb)
36109	8542311	CORNELL UNIVERSITY MAIN CAMPUS	230013	20608614	37.52
36109	8542311	CORNELL UNIVERSITY MAIN CAMPUS	230013	20608314	16.80
36109	8542311	CORNELL UNIVERSITY MAIN CAMPUS	230013	20607714	3104.50
36103	8452311	BROOKHAVEN NATIONAL LABORATORY	578913	17949314	265.51

36103	8452311	BROOKHAVEN NATIONAL	64116813	88912714	1823.50
		LABORATORY			

Point Inventory, PAH/POM, Georgia

Emissions assigned to Pollutant Code 246 (Polycyclic Organic Matter as 7-PAH) at Hartsfield-Jackson Atlanta International Airport (EIS Facility ID 9748811) in the below table should instead be assigned to Pollutant Code 250 (PAH/POM – Unspecified).

EIS	Emissions Process	2020	Source Data Set	EIS Emissions Comment
Process ID	Description	Emissions		
	SCC Code	(tons)		
84961514	Aircraft/GSE/Diesel	0.0231397	2020EPA_HAPAug	2020GADNR submitted VOC of 6.899945
	2270008005			TON times ratio of 3.354E-03, based on
				augmentation description: 119GROC
99985914	{null}	0.0343607	2020EPA_HAPAug	2020GADNR submitted VOC of 10.24592
	2275070000			TON times ratio of 3.354E-03, based on
				augmentation description: 119GROC

Nonpoint Inventory, Oil and Gas:

Pipeline Blowdowns and Pigging emissions

A new source was added this NEI cycle to the oil and gas sector. Pipeline Blowdowns and Pigging (SCC= 2310021801) emissions were estimated using US EPA Greenhouse Gas Reporting Program (GHGRP) data. These Pipeline Blowdowns and Pigging emissions included county-level estimates of VOC, benzene, toluene, ethylbenzene, and xylene (BTEX). These emissions estimates were calculated outside of the Oil and Gas Tool and submitted to EIS separately from the Oil and Gas Tool emissions. These emissions were considered EPA default emissions and SLTs had the opportunity to submit their own Pipeline Blowdowns and Pigging (e.g., Utah) emissions and/or accept/omit these emissions using the Nonpoint Survey. Unfortunately, these EPA default Pipeline Blowdowns and Pigging emissions did not get into the 2020 NEI release for the states that accepted these emissions due to EIS tagging issues. As a result, the following VOC and BTEX emissions were erroneously omitted from the 2020NEI:

State	VOC (tpy)	Benzene (tpy)	Ethylbenzene (tpy)	Toluene (tpy)	Xylene (tpy)
AL	713	1.66	0.07	1.07	0.48
AK	13	0.06	0.003	0.05	0.01
AZ	73	0.33	0.02	0.29	0.08
AR	34	0.01	-	0.001	0.001
СО	3,608	9.40	0.47	11.47	3.57
IL	380	1.49	0.08	1.32	0.38
IN	259	0.99	0.06	0.88	0.25
KS	942	1.69	0.20	1.43	0.64
KY	854	3.78	0.21	3.37	0.96
LA	549	3.70	0.00	0.42	0.66
MD	0.0	0.00021	0.00001	0.00018	0.00005
MI	307	1.39	0.08	1.24	0.35
MS	484	0.74	0.02	0.28	0.24
МО	43	0.04	0.0005	0.03	0.01

State	VOC (tpy)	Benzene (tpy)	Ethylbenzene (tpy)	Toluene (tpy)	Xylene (tpy)
MT	275	1.35	0.07	1.04	0.34
NE	89	0.21	0.01	0.27	0.09
NM	1,348	-	-	-	-
NY	202	0.92	0.05	0.82	0.23
ND	18	0.08	0.00	0.07	0.02
ОН	476	2.16	0.12	1.92	0.55
ОК	89	0.02	0.01	0.08	0.06
OR	9	0.04	0.002	0.04	0.01
PA	1,575	7.15	0.40	6.37	1.81
SD	5	0.02	0.001	0.02	0.01
TN	0.2	0.0010	0.0001	0.0009	0.0003
TX	6,285	7.91	0.19	3.17	2.68
UT	13	0.06	0.004	0.06	0.03
VA	1	0.00	0.0003	0.00	0.00
WV	1,300	5.89	0.33	5.25	1.49
Total:	19,941	51.09	2.42	41.00	14.96

New Mexico

EPA and the state of New Mexico worked together to exercise the point source subtraction step in the Oil and Gas Tool during the 2020NEI development period. This point source subtraction step was used for New Mexico because additional oil and gas point sources were submitted by New Mexico that were the same processes that are estimated in the Oil and Gas Tool (non-point sources). This point source subtraction step is a processed used to eliminate possible double counting of sources in the Oil and Gas Tool that are already defined in the point source inventory. Unfortunately, the resulting non-point emissions from the point source subtraction step for New Mexico did not get into the 2020 NEI release due to EIS tagging issues. New Mexico non-point oil and gas emissions are overestimated as a result; this table summarizes the overestimation at the state-level:

	2020NEI (tons)	Corrected (tons)	2020NEI - Corrected (tons)
СО	91,980	81,426	10,555
NH3	3	3	0
NOX	62,997	49,763	13,234
PM10-PRI	1,779	1,663	116
PM25-PRI	1,771	1,655	116
SO2	77,439	76,649	790
voc	231,810	223,174	8,636

Nonpoint Inventory, Unpaved Road Dust, Washington State

Washington state submitted daily unpaved road VMT data instead of annual VMT, resulting in VMT, and the associated emissions estimates, being a factor of 365 too low.

Default VMT	WA-submitted VMT	Corrected VMT	Default PM2.5 Emissions	2020 NEI PM2.5 (WA-VMT)	Corrected PM2.5 Emissions
445,950,202	785,190	286,594,350	6,642	12	4,314

Nonpoint Inventory, Industrial Fuel Combustion -Biomass, Washington State

Washington state observed that emissions for industrial biomass fuel combustion (SCC=2102008000) were a factor of ~9 times higher in 2020 than 2017 despite State Energy Data System (SEDS) consumption data decreasing from 74,558 (2017) to 64,453 (2020) Billion BTU (E9BTU). For the 2017 NEI, WA submitted *nonpoint* fuel consumption (Option D) ICI Input Template data of 5,776 E9BTU because they believed the SEDS estimate was too high based on available permit data and therefore estimated nonpoint industrial wood consumption at 25% the total point source value.

However, for the 2020 NEI, WA instead submitted only direct *point* fuel consumption (Option A) of 13,384 E9BTU, resulting in a *computed nonpoint* fuel consumption of 51,069 E9BTU (64,453 – 13,384), which is approximately a factor of 9 higher than the 2017 nonpoint fuel consumption. Assuming WA intended to submit 25% their point fuel consumption for 2020, their corrected 2020 nonpoint consumption would therefore be approximately 3,346 E9BTU, or a factor of 15 times less than that in the 2020 NEI.

2020	Corrected	2017	2020	2020 WA-	2020	2017	2017 WA-
NEI	PM2.5	NEI	SEDS	submitted	Computed	SEDS	submitted
PM2.5		PM2.5	(E9BTU)	Point	Nonpoint	(E9BTU)	Nonpoint
				consumption	consumption		consumption
				consumption (E9BTU)	consumption (E9BTU)		consumption (E9BTU)

Nonpoint Inventory, Industrial and Commercial/Inst. Distillate IC Engines, Washoe County Nevada

Washoe county found calculation errors for distillate fuel ICI Engines in their submittal and would choose to use EPA estimates. The values (tons) in the 2020 NEI (Washoe-submitted) and the preferred submittal (EPA Wagon Wheel tool) are shown here.

			2020 EPA	2020 NEI
SCC	Pollutant	Sector	(Wagon Wheel)	(Washoe-submitted)
2102004002	СО	Fuel Comb - Industrial Boilers, ICEs - Oil	15	3,611
2102004002	NH3	Fuel Comb - Industrial Boilers, ICEs - Oil	0.09347273	2
2102004002	NOX	Fuel Comb - Industrial Boilers, ICEs - Oil	71	3,814
2102004002	PM10-PRI	Fuel Comb - Industrial Boilers, ICEs - Oil	5	202
2102004002	PM25-PRI	Fuel Comb - Industrial Boilers, ICEs - Oil	5	202
2102004002	SO2	Fuel Comb - Industrial Boilers, ICEs - Oil	5	0.20672
2102004002	VOC	Fuel Comb - Industrial Boilers, ICEs - Oil	5	591
2103004002	СО	Fuel Comb - Comm/Institutional - Oil	0.02819474	7,160
2103004002	NH3	Fuel Comb - Comm/Institutional - Oil	0.000173506	3
2103004002	NOX	Fuel Comb - Comm/Institutional - Oil	0.1309971	6,631
2103004002	PM10-PRI	Fuel Comb - Comm/Institutional - Oil	0.009434395	371
2103004002	PM25-PRI	Fuel Comb - Comm/Institutional - Oil	0.009434395	371
2103004002	SO2	Fuel Comb - Comm/Institutional - Oil	0.008631929	0.3676187
2103004002	VOC	Fuel Comb - Comm/Institutional - Oil	0.009109071	1,003

Nonpoint Inventory, Residential Wood Combustion, Minnesota

MN discovered an error in their residential wood combustion (RWC) submittal. For mercury and PM, the errors impacted all RWC SCCs. For NOX, only EPA-certified catalytic woodstoves (inserts and freestanding) SCCs were

impacted. For SO2 and VOC, EPA-certified catalytic and non-catalytic woodstoves (inserts and freestanding) were impacted. The corrected values and those that appear in their original submittal used in the 2020 NEI are provided here at the state level.

Pollutant	Unit of	2020 NEI	2020	Corrected minus	% Change
	Measure	(Original Submittal)	Corrected	Original Submittal	
Mercury	LB	100.02	12.58	-87.43	-87.4%
NOX	TON	2,673	2,632	-41	-1.5%
PM10-PRI	TON	35,348	35,521	173	0.5%
PM25-PRI	TON	34,119	35,521	1,402	4.1%
SO2	TON	1,057	1,036	-21	-2.0%
VOC	TON	34,369	33,681	-688	-2.0%